

# **EXHIBIT B**

**Errata Sheet for Deposition Testimony of Ronald W. Erickson on May 30, 2006**

<b>Page</b>	<b>Line</b>	<b>Error or Amendment</b>	<b>Reason for Change</b>
49	13, 15, 21	Remove quotation marks.	I was paraphrasing, not quoting.
67	21	Change "Mm-hmm" to "Yes"	Clarifying.
68	10	Add at the end of the existing text: "I am not seeking damages for "stress" as an injury, only for the investment losses I incurred."	At my deposition, on page 66 lines 18-20, and page 66 line 24 through page 67 line 6, Attorney Blanchard defined "injuries" to include not only stress but also "pain" and "anguish," which were words I did not use in my prior testimony. His definition confused me as to his questions about damages. I believed he was asking about the monetary damages sought in my complaint, rather than some abstract concept of "injuries" as he defined it, as I said in my answer on page 68 lines 14-15.
72	8	Change "yes" to "correct"	Clarifying that when I answered the question "yes", I was agreeing with Attorney Blanchard that my answer was "no" to the question posed at page 71 lines 15-16, which was "Q: But are you seeking compensation for anything in addition to that monetary loss?"
72	21-22	Change answer to "No"	My testimony was inaccurate. I understand that I cannot pursue damages for pain and suffering in a case like this, either for myself or the class.
73	6-10, 13	Change answers to "No"	My testimony was inaccurate. I understand that I cannot pursue damages for pain and suffering in a case like this, either for myself or the class.

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116	5-12	Replace "this press release does not necessarily reflect the position or the policy of the government or the Department of Defense, and no official endorsement should be inferred. Statements in this press release are not strictly historical, at that point, but actual results may differ from those projected in the forward looking statements" with "The previously announced \$4.9 million in FY02/03 Congressional appropriations administered through the U.S. Army and anticipated \$4 million in U.S. Navy funding from a Cooperative Research and Development Agreement (CRADA) for clinical trials for Hemopure in trauma are project-specific funds independent from Biopure's reported cash on hand."	In answering as to the Defense Department's interest in Hemopure, I became confused and read from the incorrect portion of of Exhibit 16. This was the portion I meant to read from to answer the question.
138	9	Before the words "came back" add the words "the FDA"	In reading my testimony now, this answer sounded confusing to me, so I am clarifying what I meant in terms of who "came back" with questions.
139	4	Replace "Mm-hmm" with "Yes."	Clarifying.
143	5-6	Replace "ended up using Biopure to go ahead and cure her cancer" with "ended up using Hemopure as part of her cancer treatment"	In reading my testimony now, this answer sounded confusing to me insofar as I said "Biopure" when I meant "Hemopure" and I mis-spoke as to what role Hemopure played in the cancer treatment I had heard about on the conference call.
145	19	Change "No" to "Yes"	The correct answer was "yes." My answer was incorrect. J. Richard Crout is a defendant in this action.
149	11	Add "and Exchange Commission litigation" after the word "securities." Also, capitalize the word "Securities."	In reading my testimony now, this answer sounded confusing to me, so I am clarifying my answer.

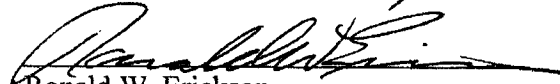
Page	Line	Error or Amendment	Reason for Change
158	10	Add after the word "read" the following: "except it does not disclose that Biopure's clinical trials had been put on hold, which I testified about on page 137 lines 11-16, page 158 line 24 through page 159 line 5, and page 160 lines 2-7."	In reading my testimony now, which was about a document I testified I had not read prior to my deposition, I realize that my answer was inaccurate and incomplete because it did not observe that Biopure's statement did not disclose the FDA hold which had been put on Biopure's clinical trials, which I'd testified about earlier on page 137 lines 11-16, and later on page 158 line 24 through page 159 line 5 and on page 160 lines 2-7.
161	22	Add after the word "working" the following: "and the FDA thought the patients were at risk."	In reading my testimony now, I realize that my answer would be incomplete without adding to it my subsequent answer on page 162 lines 3-5.
163	24	Add at the end of the existing text: "I learned about the clinical hold on or after December 24, 2003, when Biopure first disclosed it to the public."	I can now determine more precisely that I first learned about the clinical hold sometime on or after December 24, 2003, when Biopure first publicly disclosed it.
164	9	Add at the end of the existing text: "I learned about the clinical hold on or after December 24, 2003, when Biopure first disclosed it to the public."	I can now determine more precisely that I first learned about the clinical hold sometime on or after December 24, 2003, when Biopure first publicly disclosed it.
169	20	Replace answer with "No."	Attorney Blanchard's questions as to "PDUFA" confused me. The correct answer is "no."
169	22-24	Replace answer with "No."	Attorney Blanchard's questions as to "PDUFA" confused me. The correct answer is "no."
170	2-4	Replace answer with "No."	Attorney Blanchard's questions as to "PDUFA" confused me. The correct answer is "no."
173	18	Replace "No, I was incorrect on that" with "Yes, for the reasons I already testified about on page 168 line 20 through page 169 line 13 and page 169 lines 15-16."	I had indicated on page 172 lines 6-11 that I was confused as to Attorney Blanchard's questions about PDUFA. On pages 171-174, Attorney Blanchard's questions grew longer in length, and all the attorneys in the room spoke over one another frequently. In reflecting back on my answer, I realize that I was confused by that point as to what Attorney Blanchard was asking me. As I've indicated, my original answer on page 168 line 20 through page 169 line 13 and page 169 lines 15-16, about which Attorney Blanchard kept re-asking me the same or similar questions, was correct.

Page	Line	Error or Amendment	Reason for Change
174	7-12	Replace "So I'd say no, as far as I'm not aware of any at this point on this" with "Yes, for the reasons I already testified about on page 168 line 20 through page 169 line 13 and page 169 lines 15-16."	I had indicated on page 172 lines 6-11 that I was confused as to Attorney Blanchard's questions about PDUFA. On pages 171-174, Attorney Blanchard's questions grew longer in length, and all the attorneys in the room spoke over one another frequently. In reflecting back on my answer, I realize that I was confused by that point as to what Attorney Blanchard was asking me. As I've indicated, my original answer on page 168 line 20 through page 169 line 13 and page 169 lines 15-16, about which Attorney Blanchard kept re-asking me the same or similar questions, was correct.
174	23	Replace "Not that I can see" with "Yes, for the reasons I already testified about on page 168 line 20 through page 169 line 13 and page 169 lines 15-16."	I had indicated on page 172 lines 6-11 that I was confused as to Attorney Blanchard's questions about PDUFA. On pages 171-174, Attorney Blanchard's questions grew longer in length, and all the attorneys in the room spoke over one another frequently. In reflecting back on my answer, I realize that I was confused by that point as to what Attorney Blanchard was asking me. As I've indicated, my original answer on page 168 line 20 through page 169 line 13 and page 169 lines 15-16, about which Attorney Blanchard kept re-asking me the same or similar questions, was correct.
175	4	Replace "Mm-hmm" with "Yes."	Clarifying.
175	12	Replace "they've" with "Biopure has"	Clarifying that "they've" refers to Biopure.
175	15	Replace "they" with "FDA"	Clarifying that "they" refers to the FDA.
175	16	Replace "they" with "Biopure"	Clarifying that "they" refers to Biopure.
178	15	Add after the word "no" the following: "except that it does not disclose that Biopure's clinical trials were put on hold, which I testified about on page 137 lines 11-16 and on pages 158 line 24 through page 159 line 5, and page 160 lines 2-7."	In reading my testimony now, I realize that my answer is inaccurate and incomplete without mentioning the hold put on Biopure's clinical trials, which I'd testified about earlier on page 137 lines 11-16, and later on pages 158 line 24 through page 159 line 5 and on page 160 lines 2-7.

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183	13	Add after the word "no" the following: "At that point, when I first read this document in August 2003, I did not have any reason to think that it was false or misleading. I've since learned that Biopure's clinical trials and FDA approval process were put on hold due to the FDA's 200 questions, which I testified about on page 137 lines 11-16 and 20-23, on pages 158 line 24 through page 159 line 5, and on page 160 lines 2-7."	In reading my testimony now, I realize that Attorney Blanchard was not specific as to the timeframe of his question. I originally answered with regards to my state of mind in August 2003, and I am clarifying my answer now to make sure it is clear that I was doing so. Also, this portion of my deposition occurred late in the evening, and as I said repeatedly on pages 186, 190, and 194, I was quite tired by this point in my testimony.
188	16	Add after the existing text the following: "At that point, when I first read this document in August 2003, I did not have any reason to think that it was false or misleading. I've since learned that Biopure's clinical trials and FDA approval process were put on hold due to the FDA's 200 questions, which I testified about on page 137 lines 11-16 and 20-23, on pages 158 line 24 through page 159 line 5, and on page 160 lines 2-7."	In reading my testimony now, I realize that Attorney Blanchard was not specific as to the timeframe of his question. I originally answered with regards to my state of mind in August 2003, and I am clarifying my answer now to make sure it is clear that I was doing so. Also, this portion of my deposition occurred late in the evening, and as I said repeatedly on pages 186, 190, and 194, I was quite tired by this point in my testimony.
189	4	Add after the existing text the following: "At that point, when I first read this document in August 2003, I did not have any reason to think that it was false or misleading. I've since learned that Biopure's clinical trials and FDA approval process were put on hold due to the FDA's 200 questions, which I testified about on page 137 lines 11-16 and 20-23, on pages 158 line 24 through page 159 line 5, and on page 160 lines 2-7."	In reading my testimony now, I realize that Attorney Blanchard was not specific as to the timeframe of his question. I originally answered with regards to my state of mind in August 2003, and I am clarifying my answer now to make sure it is clear that I was doing so. Also, this portion of my deposition occurred late in the evening, and as I said repeatedly on pages 186, 190, and 194, I was quite tired by this point in my testimony.
207	24	Replace the word "No" with the words "I don't know."	Clarifying that I meant "I don't know" as reflected in my subsequent answer on page 208 line 4.

I have read the foregoing transcript of my deposition and except for any corrections or changes noted above, I hereby subscribe to the transcript as an accurate record of the statements made by me.

Executed this 11 day of July, 2006.

  
Ronald W. Erickson